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November 9, 2001

***By Hand and Electronic Mail***

Mary Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

**RE: D.T.E. Docket No. 01-34**

Dear Ms. Cottrell:

On October 17, 2001, WorldCom and AT&T filed their First Set of Information Requests To Verizon. Verizon filed a partial response on November 2, 2001, in which it objected to many of the requests and, notwithstanding its objections, agreed to provide within three to four weeks some of the information requested. Verizon has not yet filed any responses to a Second Set of Information Requests that AT&T and WorldCom filed on October 24, 2001.

In an effort to resolve any potential discovery dispute, I spoke today with counsel for Verizon, Barbara Anne Sousa. Although we have not resolved our differences, we are hopeful that a resolution can be achieved next week. Accordingly, pending completion of our discussions, AT&T reserves its right to move to compel and/or to seek other appropriate relief with respect to all pending discovery, including schedule changes necessitated by the extended time that it is taking Verizon to provide the information requested.

Sincerely yours,

Jay E. Gruber

cc: Service List (enclosed)